

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
at Greenbelt**

In re Rosetta Michelle Ford

Debtor

**Case No. 13-10581-WIL
Chapter 7**

Rosetta Michelle Ford

Movant

v.

Crescent Bank & Trust

Respondent

**DEBTOR'S MOTION TO REDEEM
PROPERTY PURSUANT TO 11 U.S.C. § 722**

Now comes the debtor, Rosetta Michelle Ford, and pursuant to 11 U.S.C. § 722 and Fed. R. Bankr. P. 6008, moves that the Court enter an Order allowing her to redeem certain exempt personal property, namely a 2010 Kia Optima. In support of this motion, debtor states as follows:

1. This case was filed on January 13, 2013.
2. Debtor is the owner of a 2010 Kia Optima, vehicle identification number KNAGG4A80A5425967 ("the vehicle").
3. The vehicle is tangible personal property intended primarily for personal, family or household use.
4. Debtor's interest in this vehicle has been claimed as exempt on Schedule C. (A copy of Amended Schedule C is attached as Exhibit 1 and incorporated by reference.)
5. Crescent Bank & Trust holds a valid lien on the vehicle.

6. The underlying debt owed by debtor to Crescent Bank & Trust is a dischargeable consumer debt.
7. Debtor believes that the value of Crescent Bank & Trust's secured claim in the debtor's vehicle for purposes of this motion is \$4,702.
8. Crescent Bank & Trust has filed a proof of claim in the amount of \$4,702.
9. Debtor wishes to redeem the vehicle, pursuant to 11 U.S.C. § 722.
10. The 341 meeting was held on February 20, 2013.
11. The trustee filed a no-asset report in this case on February 21, 2013.
12. No memorandum is being filed and Movant will rely solely upon this motion.

WHEREFORE, the debtor prays that the Court

- a. Enter an Order allowing her to redeem the vehicle by paying the sum of \$4,702, to the creditor, Crescent Bank & Trust, within 30 days of the date of entry of the Order;
- b. Order Crescent Bank & Trust to remove and mark satisfied any encumbrance or security interest in the 2010 Kia Optima upon payment to Crescent Bank & Trust of \$4,702;
- c. grant such other relief as may be just and proper.

Date: March 22, 2013

Respectfully Submitted,

/s/ Heather L. Gomes
Heather L. Gomes #27795
Legal Aid Bureau, Inc.
6811 Kenilworth Ave. Suite 500
Riverdale, MD 20737
(301) 560-2151
hgomes@mdlab.org
Attorney for Movant/Debtor